

United States District Court for the Southern District of New York

Civil Action, File Number 07 CV 3588

x

IOANNIS VOULELAKIS

Plaintiff,

PLAINTIFF'S
INITIAL DISCLOSURES

against —

U.S. CITIZENSHIP AND IMMIGRATION SERVICES,

Defendant.

x

COMES NOW, Plaintiff, Ioannis Voulelakis, by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 26(a)(1), and hereby makes its initial disclosures as follows:

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT MAY BE USED TO SUPPORT PLAINTIFF'S CLAIMS:

1. Plaintiff Ioannis Voulelakis.
2. Further, Plaintiff's initial disclosure is made without the benefit of any discovery and prior to Defendant's answers. Plaintiff reserves the right to amend his disclosures to add additional witnesses.

II. CATEGORY AND LOCATION OF DOCUMENTS:

1. Plaintiff Ioannis Voulelakis's complete file with the U.S. Citizenship and Immigration Services, including all applications and petitions for lawful permanent residence and citizenship.
2. Further, Plaintiff's initial disclosure is made without the benefit of any discovery and prior to Defendant's answers. Plaintiff reserves the right to amend his disclosures to add additional documents.

Plaintiff has already provided as an attachment to the complaint documentation indicating that, under Greece law, the Plaintiff has no criminal record.

III. COMPUTATION OF DAMAGES:

Not applicable to this action.

